



Name: Joelon Walker V

Prison Number: AG7726

Institutional Address: California State Prison Los Angeles County

P.O. Box 4610, Lancaster, CA 93539-4610

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Joelon Vivale Walker

VS.

1) K. Grether (correctional captain)

2) G. Jones (correctional counselor)
(Continued on Page 5)

Case No. 4:22-cv-1120-YGR

COMPLAINT UNDER THE
CIVIL RIGHTS ACT,
(42 U.S.C. 1983)

I. EXHAUSTION OF Administrative Remedies.

A. Place of Present Confinement California State Prison
Los Angeles County

B. Is there a Grievance Procedure in this institution YES

C. If so, did you Present the facts in your complaint for
review through the Grievance Procedure? YES

D. If your answer is yes, list the appeal number and the
dates and result of the appeal at each level of review.
If you did not Pursue any available level of appeal,
explain why.

1. Informal appeal: (see Page listed Appeals)

2. First formal level: (listed Appeals page 4)

3. Second formal level: _____

4. Third formal level: _____

E. Is the last level to which you appealed the highest level of appeal available to you?

YES ☒ NO ☐

F. If you did not present your claim for review through the grievance procedure, explain why.

II. Parties.

A. Write your name and present address. Do the same for additional plaintiffs, if any.

Devon Walker resides At California State Prison Los Angeles County P.O. Box 4610, Lancaster CA 93539-4610

B. For each defendant, provide full name, official position and place of employment.

(See page 5 Parties defendants)

1 **III. Statement of Claim.**

2 State briefly the facts of your case. Be sure to describe how each defendant is involved
3 and to include dates, when possible. Do not give any legal arguments or cite any cases or
4 statutes. If you have more than one claim, each claim should be set forth in a separate
5 numbered paragraph.

6 (See Pages 6 - 81 Factual Allegations)

16 **IV. Relief.**

17 Your complaint must include a request for specific relief. State briefly exactly what you
18 want the court to do for you. Do not make legal arguments and do not cite any cases or
19 statutes.

20 (See Page 82 Relief)

24 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

25 Executed on: February 15 2022

Date

Joemon Walker

Signature of Plaintiff

EXHAUSTION OF ADMINISTRATIVE REMEDIES;

- 1) Note: There's Two levels in the health care Appeals process, Institutional level and headquarters level)
- 2)
- 3) 1 Tracking # HDSP 18000894 (NO Intervention on both levels)
- 4) August 15 2018, October 24 2018.
- 5) 2 Tracking # 18000768 (No Intervention on both levels) JULY 17
- 6) 2018, October 24 2018.
- 7 3 Tracking # HDSP HC 19000052 (No Intervention on both levels)
- 8) March 13 2019, June 19 2019.
- 9) 4 Tracking # HDSP HC 19000744 (No Intervention on both levels
- 10) December 25 2019, February 19 2020.
- 11) 5 Tracking # HDSP HC 19000027 (No Intervention on both levels
- 12) May 28 2019, September 9 2019.
- 13) 6 Tracking # HDSP HC 19000028 (No Intervention on both levels
- 14) May 28 2019

15

15)

CDCR Inmate Appeal:

- 16) Note: There's Three levels to Inmate Appeals.
- 17) 7 Local Log No: HDSP-18-01712, TLR case No: 1812007
- 18) Denied on all Levels. submitted 5-4-18 Denied 12-2018
- 19) 8 Local Log # HDSP-C-18-01076, HDSP-18-02659 TLR # 1812444
- 20) Rejected, Cancelled, Denied.
- 21) ~~9 Local Log # HDSP-18-01712 TLR # 1812007 Rejected, Denied~~
- 22) 10 Local Log # HDSP-19-02557 Partially Granted, Denied
- 23)
- 24)
- 25) Health Care Appeal
- 26) 10 Tracking # HDSP HC 17000292 Submitted 12-4-17
- 27) (Intervention) 2-12-18
- 28)

II.

PARTIES

1.) Ellis, RoseAnn RN (Registered Nurse) at High Desert State Prison
2.) Miranda, Rafael PA (Physicians Assistant) at High Desert State Prison
3.) Temple, Ariana LVN (Licensed vocational nurse) at High Desert state Prison
4.) Chiquaque, Ginny RN (Registered Nurse) at High Desert State Prison
5.) Ruetter, Kevin CPS (Chief Physician & Surgeon) at High Desert state Prison
6.) B. Fehr C/O (Correctional officer) at High Desert state Prison
7.) D. Clifford C/O (Correctional officer) at High Desert state Prison
8.) B. Hathaway SG (Sergeant) at High Desert State Prison
9.) J. Kline C/O (Correctional officer) at High Desert state Prison
10.) Coningham (Sergeant) at High Desert state Prison
11.) Arnold (Sergeant) at High Desert state Prison
12.) Hubbard Nancy RN (Registered Nurse) at High Desert state Prison
13.) Pribble (Correctional officer) at High Desert state Prison
14.) H. Martinez (Correctional officer) at High Desert state Prison
15.) J. Quam (Correctional counselor) at High Desert state Prison
16.) R. Chandler (Lieutenant) at High Desert state Prison
17.) Mark Davis (Physician & Surgeon) at High Desert state Prison.
18.) Avila, Dana (Registered nurse) at High Desert State Prison
19.) John Doe Page 9 line 28 (Sergeant) at High Desert state Prison
20.) Heckard Daxleshawda (Licensed vocational nurse) at High Desert state Prison
21.) Harwood, Joyce (Nurse) at High Desert state Prison.
22.) Sherman (Correctional officer) at High Desert state Prison
23.) Kimble (Correctional officer) at High Desert state Prison
24.) Ansila (Nurse) may be from High Desert State Prison was at Banner.
25. medical center.
26.) Nyxstrom Darren (Correctional officer) at High Desert state Prison.
27.) J. Pickett (Chief Deputy warden (A)) at High Desert state Prison
28.) D. Snell (Chief Medical Executive)

FACTUAL ALLIGATIONS;

1) I, Jevon Walker swallowed a sharp object while eating the evening
2) meal while housed in High Desert State Prison on April 22 2018 at
3) which the Foreign Body is still stuck in my intestines to date.
4) On this day the tower officer H.Martinez opened my cell door
5) first waited until I walked out, and then opened all other doors
6) (Note; Some days I would let other inmates go before me while
7) standing in the door frame) When I walked down the stairs to the tray
8) cart, there were one stack of trays, the top tray was red, and all
9) other trays were Beige. I pulled the top tray and started walking
10) back to my cell while correctional officer B.Ffehr was holding
11) on to the other tray cart (Note: At times I would pull a tray from
12) another cart) his partner D.Clifford was sitting down at the table
13) with his back turned from all other Inmates.
14) Once in the cell I started eating fast so that I could be on
15) time for tray pick up, and that's when I swallowed the unknown object
16) while eating the chicken, which scraped my throat as it went down.
17) I did not report it on that day thinking that it might pass on
18) its own, but when it didn't pass, and the pain was getting worst,
19) I submitted a CDCR form 7362 Health care service request form
20) on May 1 2018. I was seen the same day by Registered Nurse
21) Ginny Chiguaque, who checked my vitals and diagnosed me with
22) Gastritis and sent me back to the unit.
23) On May 4 2018 I submitted a CDCR form 602 (Inmate Appeal)
24) explaining the Issue (Log# HDSP-18-01712) (Note: Prior to the
25) incident I've submitted multiple CDCR forms 602 complaining
26) of harmful chemicals being administered through my food)
27) On May 15 2018 Appeals Coordinator J.Quam, CC11 rejected
28) the Appeal under California code of regulations, Title 15

FACTUAL ALLIGATIONS

1)Section (CCR)3084.6(b)(6). stating that the appeal makes general
2)alligation,but fails to state facts or specify an act or decision
3)consistant with the allegation.Bellow that, it states:Inmate Walker,
4)according to your 602,the nurse diagnosed you with gastrititis
5)and stated to you that it was not because you swallowed something
6)sharp nor was it a bone.(See Exhibit "A")(Page 20-31)

7) On May 17 2018 I resubmitted the appeal and cited (CCR)3084.6(1)
8)in section B of the 602 form which states In part:The appeals
9)coOrdinator "Shall" provide clear and sufficient instructions
10)regarding further action the Inmate must take to qualify the
11)appeal for proessing,and in my own words i added"Quam, you have
12)failed to provide clear and sufficient instructions for me to
13)take for the appeal to be processed.(Page 24 refer 22)

14) On May 21 2018 Appeals Coordinator M.Chappuis screened the
15)the appeal stating:Please assign this appeal to the appropriate
16)staff for second level response(see,Exhibit "A")(Page 26)

17) On June 6 2018 I was called to an hearing, sergent B.Hathway
18)ask me how did staffs actions contribute to the object in your
19)stomach.I stated to him thatthat the tower officer Martinez
20)opened my door first, and he stoped me before i could finish
21)and said he spoke to Martinez and he told him that he always opens
22)my door first,I said yes thats true but this time he opened my
23)door and made sure i walked out first,because sometimes i would
24)let other Inmates go before me.He took notes and said your
25)appeal is denied and sent me back to the unit.

26) OnJuly 5 2018 I was called to the program office for another
27)interview by R.Chandler who stated to me that he was on vacation,
28)and that they cant hear the 602 Appeal like that so he had to do it.

FACTUAL ALLIGATIONS

- 1) he denied the appeal and sent me on my way (See Exhibit A)
- 2) I appealed the second level decision and submitted it to
- 3) Chief inmate appeals branch on August 13 2018, to the Third Level
- 4) and the appeal was denied on December 20 2018 (Log#TLR case No:
- 5) 1812007) Appeals Examiner J.Dominguez and M.Voong, Chief office
- 6) of Appeals. (Page 21, 23-31)
- 7) On May 10 2018 I had a visit with my primary care provider
- 8) Rafael Miranda, explaining my pain level regarding the Foreign
- 9) Body, and he had me transported to central Health for an X-Ray,
- 10) While in central Health a lady (Jane Doe) ask me what my complaint
- 11) was, and i explained to her that I swallowed an object while eating
- 12) the evening meal, and she completed the X-Ray. I was then escorted to
- 13) see the Doctor Mark Davis (P&S). I explained to Davis all the
- 14) circumstances of how the object got in my stomach and he tried
- 15) to convince me over and over that i dont have anything stuck in
- 16) my stomach, that it didnt come from the food, and that custody is
- 17) not doing anything to my food (Note: I submitted a CDCR form 602
- 18) Inmate Apppals form on the incident on May 4 2018). He, Davis also
- 19) said, are you sure its not in your Head? then he goes on to say that
- 20) you might be or have been sitting the wrong way or you may have
- 21) slip rib Syndrom because your X-Ray was negative.
- 22) I let him know again that I swallowed something sharp that was
- 23) inside my chicken and that it ~~scraped~~ scraped my throat and shot
- 24) down before I could catch it because I have allergies and i
- 25) was chewing and swallowing with my nose blocked. He said are you sure
- 26) its not an ulcer? I said its not, and he said ok Ill order you a
- 27) drink (medication) that will help loosen your intestines and
- 28) possibly push whatever is stuck out so it will come out natrally.

FACTUAL ALLEGATIONS

- 1) Approximately Two days later i was called to the medical window
- 2) to pick up medication KOP(Keep on person) when i arrived at the window
- 3) a male Nurse(John doe) ask for my ID, he scanned it, and gave it
- 4) back to me along with medication. The medication was: Ameri-sour-ceberg
- 5) Tablets chewables for Gas prescribed by Dr. Miranda. And Ranitidine for
- 6) ulcers prescribed by Dr. Davis.
- 7) On May 16 2018 I submitted a CDCR form 602 HC (Health Care Appeal)
- 8) ~~xxxxxx~~ requesting to be provided with the medication that Dr. Davis
- 9) stated that he was going to prescribe for me, specifically, the drink to
- 10) help loosen my intestines. The Appeal was EXCCEPED and a hearing was
- 11) held in the program office by registered Nurse D. Avila on June 29 2018
- 12) Institutional level response (No intervention) The reviewing authority
- 13) Kevin Rueter, M.D., CP&S. I resubmitted the appeal to the Headquarters
- 14) level and it was denied (NO INTERVENTION) (LOG#18000768) See Exhibit ____)
- 15) On June 5 2018 I ask my floor officer J. Kline if he could allow
- 16) me to go to medical for an emergency and he said yes. While in
- 17) medical i was seen by LVN Heckard Dayleshawda, and i explained to
- 18) her that ive been having a foreign object in my stomach since
- 19) April 22 2018. She checked my vitals and stated that all was normal
- 20) she checked the computer and said you had an X-Ray on May 10 2018
- 21) that was negative for any Foreign body in your stomach. I said I
- 22) know but the object is still there, she said is this a man down
- 23) situation? I said yes. She then motioned to the officer that it
- 24) was a medical emergency. Multiple officers ran into the C_-yard
- 25) clinic as well as other medical staff, Harwood Joyce came in and
- 26) ask Heckard did she call it in she (Harwood) then started asking
- 27) me multiple questions aggressively while a sergeant was also
- 28) asking me questions (JONN DOE) he ask if i swallowed a knife

FACTUAL ALLEGATIONS

- 1) I said no, and he said if he didnt swallow a knife then hes fine.
- 2) After that episode I was transported by ambulance to the central
3) health (CTC) while in CTC i was seen by DR. Davis along with a sergeant
4) and other officers who were trying to convince me that a blood sample
5) was necessary, all taking turns trying to get me to concent saying that
6) I cant get a CT scan unless i give the sample and Davis said we need
7) to see if you can take the contrast Dye, I refused at that time. I then
8) let Davis know that I need to be in Administrative Segregation
9) because of whats being done to my food, and that fact that i would be vul=
10) nerable with this stuck in my stomach. I was then discharged and sent
11) on my way back to the yard and escorted to the program office. In the
12) ~~In the~~ office was sergeant Arnold and coningham who ask me why I dont
13) want to return back to my cell, I let them know the same reason
14) because of the ~~for~~ foreign boby. Then coningham said "IM tiered of
15) your shit you writing 602s about your food being contaminated no-
16) body is doing anything to your food" I then said to him to be pro-
17) fessional, and he said "your not going to the hole now go back to your
18) cell the Doctor said youre cleared and you cant be refusing treat-
19) ment your not a Doctor." Before i left I stated to all of them that
20) this was a very serious matter and that they are all involved now
21) and sergeant Arnold said Im fine with that im transfering anyway.
- 22) On JUNE 6 2018 i was called to the clinic to see Doctor
23) R.Miranda who simply explained to me what Doctor Davis wrote the
24) day prior. Shortly after that I was told by Correctional officer
25) winz to report to the program office for a 602 Appeal hearing.
26) The 602 was regarding the Foreign Body in my intestines, the
27) interviewer was sergeant Hathaway.
- 28) ~~On JUNE 6 2018 at 9:20 PM LVN Dike Abigail came to the cell~~

FACTUAL ALLEGATIONS

- 1) On June 14 2018 LVN Dike Abigail came to the cell(C-5-218) and
2)gave me a paper letting me know not to eat or drink after midnight
3)because I was going to the outside hospital.She then gave me a milk
4)like drink with a fruit sign (grape)and told me to drink all of it
5)I ask what was it for, and she told me it was to help me go.(Note;
6)after requesting for my medical records it states that the drink was
7)BARIUM SULFATE see exhibit 13)
- 8) On June 15 2018 I was called to report to the clinic by the tower
9)officer Sherman.At the clinic Lvn(Temple Ariana)gave me the exact same
10)drink and said you have to drink that before you can get the ct scan
11)today otherwise it would show all bone.As I was taking the drink to the
12)holding cell Temple blerted out "enjoy your liquid breakfast," and
13)while I was drinking it a C/O (john doe)said laughing "make sure
14)you drink it all up".After that she said head back to the cell
15)and wait for transportation.
- 16) About 20 minutes later I was transported to susanville medical
17)center BANNER.Correctional officers KIMBLE and his partner (john doe)
18)while we waited in the waiting room a lady Angila gave me some
19)papers to sign,the papers said in part that,"all decisions were
20)coming from my primary care provider and that the people who
21)would be assisting are not apart of Banner.
- 22) After I signed the papers Kimble got a phone call from the
24)room phone, he, then stoped his conversation and said "Hey Walker
25)would you be willing to give a blood smple"? I said yes.He hung
26)up, and he and his partner started laughing, so i ask Kimble
27)who that was on the phone, asking for my concent to give a blood
28)sample.He said it was a Nurse, but I dont know her name, so i said

FACTUAL ALLEGATIONS

(12)

1) I refuse at this point until I hear from a doctor. He said okay
 2) and then walked out of the room. About ten minutes later he came
 3) back in with a lady I heard him call Angela. She said why don't you
 4) want to give a blood sample? I said because no doctor told me to
 5) give one. She said you have to give one before you can get the CT
 6) scan so we can know if your body can take the contrast dye, plus
 7) the sample you took in February showed positive for something. I
 8) consented.

9) A lady named candice drew my blood and after about two hours
 10) Kimble got on the phone and said your test negative now you can
 11) get the CT scan. As we were walking through the halls we where
 12) met with a guy (John Doe) who said he would be performing the
 13) procedure. He said so you've been having stomach problems? I said
 14) yeah I have something stuck in my stomach. He said did you drink
 15) the drink this morning? I said yes.

16) After that he hooked an IV into my arm and injected me with
 17) contrast dye, I immediately sat up almost throwing up, and Kimble's
 18) partner put a can in front of me. After my body and the dizziness
 19) settled down the Guy (John Doe) said I never had anyone react to
 20) contrast that way. He completed the CT scan and Kimble said
 21) laughing didn't you eat this morning? I said ~~know~~ and he said oh I ~~the~~
 22) thought you did.

23) On December 4, 2017 I submitted a CDCR 602 HC Health Care
 24) appeal log # 17000292 for WA and blood test for any unlawful sub-
 25) stances that was being administered in my food. On February 2, 2018
 it was granted (Institutional level intervention (See EXHIBIT "D")
 26) (Upon information and belief, the reason why I was asked repeatedly
 27) to consent to a blood test on May 10, 2018 and June 15, 2018 was
 28) because of the Health Care appeal.

FACTUAL ALLIGATIONS

1) On September 24 2019 I brought out a medical request form
 2) and put it in the medical box. I requested to see my primary care
 3) provider R. Miranda because on my last visit with him he said that
 4) he would put in a request for services for me to see a specialist
 5) to use a camera down my throat to check for the foreign body in my
 6) stomach, that same night I was given Two priority passes to medical
 7) and one mental health pass.

8) On September 25 2019 I was called off the yard to report to
 9) medical at about 10:30 am, when I arrived at the clinic I was immediately
 10) approached by a nurse (no name tag) she said walker would you be willing
 11) to sign a refusal for the medical request form that you submitted
 12) yesterday because you were already going to be called for a follow
 13) up but it took longer than Two weeks. So I said that's pretty suspicious
 14) that I'm being called for a follow up on the day I submitted another
 15) request so no I'm not going to sign, she said ok and left.
 16) After that I was called in to see the Doctor but it wasn't Miranda
 17) it was Mark Davis the first thing he said was, you were called in
 18) because of your Kidney damage and stomach problems. So I said you
 19) mean this foreign body stuck in my stomach? he said oh yeah you
 20) mean the plastic stuck in your stomach? I said I don't know what it
 21) is I never said it was plastic. Then he started showing me X-Ray
 22) images giving me a general education on how to read them so I ask
 23) "hi where are the CT Scan images?" and he said "we don't have them but
 24) I can get them for you." He then said "how's your pain level?" I said "I
 25) function in pain, and I still can't sleep on my stomach which is
 26) the normal way I sleep." He said "do you snore?" I said "no" he said
 27) "maybe that's why you can't sleep on your stomach." I said, "that's not
 28) the reason nor is it slip rib syndrome or acid reflux." He then started

FACTUAL ALLIGATIONS

1. laughing and said Youve been doing your homework and I let him know I have
2. my medical records. He then started reading the results of the CT scan and I
3. said I already have those papers we need the images.
4. After that he checked my tonsils my eyes and had me lay on the medical
5. bed. he pressed on my stomach and said you seem to be fine and I said
6. the only reason why I submitted this request was to see if the request
7. to see the GI specialist got approved or denied he said it was denied but
8. you can go2 it.

9. On March 20 2018 my door was opened first for chow
10. (Dinner) and C/o Pribble Put a tray on top of the tray cart, I
11. grabbed the tray and went back to my cell. While I was eating
12. I instantly of an unknown substance to my Penis and scrotum
13. while housed at High Desert State Prison on yard C, cell 218,
14. in 5 Building. I submitted a CDCR 602 Inmate appeal on
15. March 20 2018 (Log # HDSP-C-18-01076) The appeal was
16. rejected 3-27-18, 5-29-18, 6-18-18, cancelled 7-3-18 by M.
17. Chappuis Counselor and appeals coordinator Third Level appeal
18. decision denied. (Last level)

1. CDCR 602 Inmate Appeal (Log # HDSP-19-02557) (TLR # 2005555)

2. (~~EXHIBIT c~~) Page 69 *And 71

3. On June 13 2019 during morning chow (cell feeding) C/o Nystrom
4. Darren ID # [NYDA002] gave me a bad smelly lunch again deliberately. I
5. let him know politely that he gave me a bad lunch and he initially ig-
6. nored me. I let him know again and he said, "if I have extra lunches I'll
7. give you one." After about two cells down he came back with another bad
8. lunch (spoiled meat). So I let him know "this one is bad also," he kept mov-
9. ing. When he came back to pick up trays I ask him, who the free staff (cook)
10. was in the kitchen, he said "I don't know." So I let him know that I was
11. gonna keep the tray until you have him come to the cell so I could show
12. him or her what they're allowing to come out of the kitchen. He then
13. slammed the tray slot and blurted out over the tier "this Dick head walker
14. is holding a tray again." After hearing that I (regretfully out of character)
15. blurted out "Just give me a better lunch fast." About 30 minutes later C/o
16. Kline came to the cell and said "give me the tray back." So I said "why
17. didn't you just bring me a better lunch that I can eat?" He said, "Nystrom
18. gave you another lunch." I showed him both lunches with the spoiled meat.
19. He then left and came back with four lunches and said "give me those back".
20. I did and he said, "pick one." As I was going through them, they all had spoiled
21. meat. So I said "why would you waste your time to do this?" "You can clearly see
22. they're not good." He then said, "what do you want me to do go to walmart you
23. get what you get." So I said I don't have to except spoiled lunch meat. Then he
24. (Kline) said "602 the kitchen" and I let him know in order to file a staff
25. complaint it has to be a person. Then I said "who's the free staff?" he said I
26. don't know and gave the kitchen officer's name. Then he ask the tower officer
27. if he knew and he said no he then said just give me a name. And he left (kitchen
28. in building) came back and said I.E. Suvilla laughing. I gave him the tray back and

FACTUAL ALLEGATIONS

1. took a bad lunch.

2. On June 25 2019 I received an RVR (Rules violation Report) and C/O
3. Nystrom left out why I was holding a food tray (bad lunches) as well as
4. what he blurted out over the tier (This Dick head Walker is holding a tray again)
5. and still wrote me up under Title 15 3005(b) willfully refusing a direct order.
6. Division D Delaying a Peace officer in the performance of duties. Found Guilty of
7. Division F Disobeying an order. Disposition 30 days loss credit, 30 days no
8. Phone Privileges, 30 days no day room.

9. On August 7 2019 I was called to unit Classification Committee (ucc)
10. to establish work group Privileges to C/C before correctional Counselor
11. G. Jones and Captain K. Grether. on the Chrono it states in part: "ucc
12. notes subject used derogatory language towards staff and elects to deem
13. subject a Program Failure" (EXHIBIT "E")

14. ~~On September 4 2019 I was called back to committee~~

15. Also on August 7 2019 during Committee Counselor Jones and Captain
16. K. Grether was trying to figure out which RVR they would refer to to put
17. me on C/C, they had me step out. They called me back in shortly after and
18. said one RVR is pending so we will use the one when you held a tray
19. on Nystrom and we will send you to the lower yard in 1 building for 30
20. days and then bring you back in 30 days to put you back on for the other
21. RVR.

22. On August 8 2019 I was told to pack my property and move to 1
23. building all of my appliances have been confiscated.

24. On September 4 2019 I was called back to committee and extended.

FACTUAL ALLEGATIONS.

(17)

1. On June 12 2018 Miranda Rafael ordered for Procedure surgery prep
 2. Ct Scan 1 Bottle of oral Contrast for June 14 2018 At 2100 And a 2ND
 3. Bottle of oral contrast for June 15 2018 At 0630 yet on June 14 2018
 4. Dike, Abigail (Licensed vocational Nurse) gave me (BARIUM SULFATE) ORAL
 5. SUSPENSION which was in fact medication. And on June 15 2018 Temple,
 6. Arianna (Licensed vocational Nurse) gave me the same bottle of
 7. BARIUM SULFATE and said "enjoy your liquid breakfast" yet on the Progress
 8. notes it says that she gave me oral contrast for imaging examination.
 9. (EXHIBIT "B" page-8)

10. The following facts are those of Physicians and Nurses changing what
 11. my chief complaint was and still is, that I swallowed a foreign Body
 12. while eating the evening meal. And some being truthful (EXHIBIT "B" 1-22)
 13. May 1, 2018 Chiguague, Ginny (Registered Nurse): follow up gastritis S/P
 14. Swallowed something, he thinks it may be a peice of small bone.
 15. (EXHIBIT "B" page -)

16. May 10 2018 day of urgent x-ray Miranda, Rafael (Physician Assistant):
 17. Acute abd Pain, acute back Pain, see W/A dip Results, he says he ate some-
 18. thing sharp. I/P says he swallowed a "sharp object" 2 weeks ago and
 19. says he still feels mild discomfort on his Luq, like it is still lodged
 20. in his stomach and is very concerned but will not say what he may have
 21. Swallowed. Nurse note 5/1/18 says he swallowed a chicken bone. No
 22. worsening symptoms over 2 weeks though. (EXHIBIT "B" Page-5)

23. May 10, 2018 Ellis, RoseAnn (Registered Nurse): I/P informs "I acci-
 24. dently swallowed something." (EXHIBIT "B" Page-10)

25. May 10, 2018 Davis, Mark (Physicians And surgeon): Patient states that
 26. he was eating chicken and swallowed a bone scratched in the throat and
 27. also seem to scratch in the stomach area he has had some left upper and
 28. epigastric pains. (EXHIBIT "B" Page-9)

FACTUAL ALLIGATIONS (18)

June 5 2018 Hubbard, Nancy (Registered Nurse): C/o Persistent R Sided abd/flank Pain Since May 10, no relief in spite of direct care by PCP and Triage RN. Initial complaint was that he swallowed a chicken bone and it was lodged in his colon. Several X-rays have been negative. I/M states "That doesn't matter. There's something in there cause it really hurts." Denies swallowing any foreign object recently. Denies any change in bowel or void habits. LBM this AM was normal (EXHIBIT "B" PG-14)

December 14 2018 Miranda, Rafael (Physicians Assistant): I/P says he swallowed a non-metallic object 4/2018 and still has RUQ Pain when lying down Prone. No new symptoms (EXHIBIT "B" Page - 15)

January 13 2019 Miranda, Rafael (Physicians Assistant) I/P says he has chronic RUQ discomfort after swallowing an unknown object that was not metal, since it does not appear on X-ray. He says he was not told that his RFS (Request for Services) for an UGI (Gastrointestinal) was denied (EXHIBIT "B" Page 13)

February 15 2019 Carel-Santana, Angela (Registered Nurse) Since APRN After swallowing a Piece of Plastic. No change in Pain rating (EXHIBIT "B" Page - 23)

Gastro (UGI) Procedure

On February 15 2019 I was transported to Renown Medical Center in Reno Nevada, while in the hospital I was seen by a Lady (Jane Doe) who had me stand up with my back against an X-ray machine, she then gave me Powder, added liquid, another cup, and a bottle, half full with white liquid and a straw. (Same exact bottle that the Barium Sulfate liquid was in that was given to me on June 14 and June 15 2018. Yet it had no label on the bottle) I was told to take sips of the liquid at a time. (Upon information and belief, the lady at Renown was trying to get

FACTUAL ALLEGATIONS (19)

1. me to believe that the drink that I was given on June 14 and
2. June 15 2018, was oral contrast by using the same bottle be-
3. cause she told me it was contrast, Plus I've already made
4. Complaints via CDCR 602 Health care Grievance at the Prison
5. and they all (medical staff) communicate). (EXHIBIT "B" page - 11)

Ultrasound

7. On March 30 2018 I had an ultrasound Procedure done
8. on my Testicles because of my multiple complaint of harmful
9. Substances that was being administered in my food (EXHIBIT
10. "B" Page - 16) and the injury to my scrotum was diagnosed
11. or called "Hydrocele", which is a liquid build up caused by
12. injury which is consistent with the description that I've
13. been giving all these years that when I Consume the food
14. after the administration of the substance my scrotum
15. Contracts tightly to the Point of Pain for some hours and
16. when it (Substance) wears off my scrotum fills with liquid
17. (EXHIBIT "B" Page - 16)

18. On March 23 2020 Doctor Miranda Rafael documented that my
19. Chief Complaint was CKD 1 (Chronic Kidney Disease), Nasal Polyps, weight loss
20. ~~Apom in~~ (see exhibit "B" Page 1) (Apom information and belief Miranda
21. diagnosed me with Chronic Kidney disease and weight loss to include me
22. in a dietary intervention program to cover up for that these things
23. were being done to me without my consent, yet on the CT scan results
24. it states on Paper that my kidneys were normal (see exhibit B Page 22)
25. (Also Apom information and belief between 2014-2020 I was ask by a
26. nurse to give my Social Security number to her (Jane Doe) and they may
27. have also included me in a research Project)

FACTUAL ALLEGATIONS

I, Joelon Walker (Plaintiff) am still unaware if there is or has been a policy by CDCR that subjected me to this kind of treatment regarding staff issuing me food with multiple unknown harmful substances but I was tipped off by a staff member in 2020 who said to me "Its your diet" which made me look closer at my medical records and noticed it said outpatient and weight loss (see exhibit "B" page 1) I noticed orders in all my medical records

I then discovered in the California Code of Regulations Title 15 Crime Prevention and Corrections section 3999.308 (Outpatient Dietary intervention) (see Exhibit A Page 1)

I also discovered 3999.350. Aversive Therapy (see exhibit A page 2) which states in Part: Nothing in this section prohibits the administration of drugs intended to cause negative physical reactions to ingestion of alcohol or drugs unless part of a program of aversive conditioning. This could also be a policy that has been used on me for harm because after being transferred to Donovan (unlawfully) staff lied and said I possessed a needle (set me up for complaints)

All CDCR staff listed on page (5) knew or should have known that their actions and inactions could cause serious and permanent damage. (upon information and belief they all tried and did cover up for one another)

VII.

PRAYER FOR RELIEF

- 1) Issue a declarator Judgement that the defendants actions and inactions complained of herein violated Plaintiffs rights under the U.S. Constitution and as otherwise alleged herein;
- 2) Award Plaintiff monetary damages compensatory and Punitive in an amount to be determined at trial;
- 3) For the court to issue an injunction ordering the chief Medical Executive, Chief Executive officer, or the responsible and capable supervisors at High Desert State Prison to retrieve and Produce all Physical Images (not paper results) from (1) X-ray on May 10 2018 (2) CT Scan (Computed Tomography) on June 15 2018, And Gastro (UGI) on February 15 2019, because medical staff at Richard J. Donovan Correctional Facility in 2020 And at California State Prison Los Angeles County in 2020 and 2021 all denied me a repeat ct scan because of the Paper result that read negative June 15 2018 from High Desert.
- 4) For the Court to appoint an attorney because of the unique and complex nature of the claims and to gather discovery (Imaging) because as an inmate I cant possess them and I cant get the Foreign Body removed from my abdomen until I can Prove what they (Banner medical staff) did and didnt do.
- 5) Award Plaintiff the costs of suit reasonable attorneys fees; and
- 6) Grant Plaintiff such other and further relief as the Court deems Just and Proper.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FORGOING IS TRUE AND CORRECT.

Executed on: February 16 2022
Date

Jefferson Walker
Signature of Plaintiff